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June 17, 2022

Via ECF and e-mail

The Honorable John P. Cronan
United States District Court
Southern District of New York
500 Pearl Street, Room 1320
New York, NY 10007
<CronanNYSDChambers@nysd.uscourts.gov>

Re: Joint request for extension in the matter of *Martin J. Walsh v. MBB Services Inc. d/b/a MBB 1881 Tremont et al.*, Civ. A. No. 22-cv-02206-JPC

Dear Judge Cronan:

Pursuant to the Court's Individual Rules and Practices, we write on behalf of the parties to request an adjournment of the upcoming deadlines to submit the case management plan and joint letter as ordered in the Notice of Assignment issued on June 9, 2022 (ECF Doc. No. 11). Pursuant to the Court's Order, the case management plan and joint letter are due to be filed no later than seven days prior to the Initial Pretrial Conference scheduled on June 28, 2022. The parties seek to have the deadlines postponed until after the parties' mediation ordered by the Court takes place. See Mediation Referral Order (ECF Doc. No. 12). The requested extension is warranted to allow the parties to focus their efforts on preparing for and engaging in the mediation and settlement discussions, including working on exchanging documents and information as instructed in the Mediation Referral Order.

In light of the parties' agreement and the good cause outlined above, the parties respectfully request that the deadline to file the case management plan and joint letter be postponed until after the mediation.

The parties' request is granted. The Initial Pretrial Conference ("IPTC") scheduled for June 28, 2022, at 11:00 a.m. is adjourned to August 9, 2022, at 11:00 a.m. At the scheduled time, counsel for all parties should call (866) 434-5269, access code 9176261. The parties shall submit the pre-IPTC joint letter and the proposed Case Management Plan and Scheduling Order, *see* Dkt. 11 at 1-2, by August 2, 2022.

Respectfully submitted,

Meltzer, Lippe, Goldstein & Breitstone, LLP
Attorneys for Defendants

/s/ Larry R. Martinez
Larry R. Martinez, Esq.
Justin A. Schwamb, Esq.

SO ORDERED.

Date: June 21, 2022
New York, New York

A handwritten signature in black ink, appearing to read 'John P. Cronan', written over a horizontal line.
JOHN P. CRONAN
United States District Judge